

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

COACH, INC., a Maryland Corporation;
COACH SERVICES, INC., a Maryland
Corporation,

Plaintiffs,

vs.

PEGASUS THEATER SHOPS, an
unknown business entity; SHERL
STOCKING, an individual; and DOES
1-10, inclusive.

Defendants.

CASE NO. 12-CV-01631-MJP

**PLAINTIFFS' NOTICE OF MOTION
FOR PARTIAL SUMMARY
JUDGMENT RE LIABILITY**

NOTE ON MOTION CALENDAR:
July 19, 2013

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on **Friday, July 19, 2013** in the above entitled court, Plaintiffs Coach, Inc. and Coach Services, Inc. (hereinafter collectively "Coach") will and hereby do move this Court for summary judgment on the issue of liability for Trademark Infringement (15 U.S.C. § 1114) against Defendants Pegasus Theater Shops and Sherl Stocking on the ground that there is no genuine issue as to any material fact regarding Plaintiffs' ownership of the trademarks in question and Defendants' infringement thereof, and that the moving party is entitled to judgment as a matter of law.

PLAINTIFFS' NOTICE OF MOTION FOR PARTIAL
SUMMARY JUDGMENT RE LIABILITY

GORDON & REES LLP
121 SW Morrison Street, Suite 1575
Portland, OR 97204
Tel.: (503) 222-1075

1 This Motion is made following notification of Plaintiffs' intent to file the present
2 motion to Defendants, who have declined to stipulate to the order sought by Plaintiffs.

3 The Motion will be based on this Notice, the accompanying Points and
4 Authorities, the Declarations of Ethan Lau, Donald Bambenek, and Michael
5 Marchand, the files and records in this action, and any further evidence or argument
6 that this Court may properly receive at or before the hearing.

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8 DATED: June 14, 2013

BLAKELY LAW GROUP

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10 By: /s/ Michael Marchand
11 Brent H. Blakely
12 Michael Marchand
13 *Attorneys for Plaintiffs Coach, Inc. and*
14 *Coach Services, Inc.*
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